

South Carolina Commission on Higher Education

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CAAL 2-2-12 Agenda Item 6

February 2, 2012

MEMORANDUM

TO: Dr. Bettie Rose Horne, Chair, and Members, Committee on Academic Affairs and

Licensing

FROM: Dr. T. Michael Raley, Director of Academic Affairs and Licensing

Reconsideration of Request for Amendment to Existing License to Add New Site

A.A.S., Business Administration; A.A.S., Criminal Justice; A.A.S., Healthcare

Reimbursement; A.A.S., Medical Assistant; A.A.S., Medical Office Administration;

A.A.S., Surgical Technology

Virginia College, New Site in Florence

Summary

Virginia College (VC) in Birmingham, AL (www.vc.edu) requests approval of an amendment to its license to add a new site in Florence. The College proposes to offer at the new site existing programs leading to the A.A.S. degree in (1) Business Administration, (2) Criminal Justice, (3) Healthcare Reimbursement, (4) Medical Assistant, (5) Medical Office Administration, and (6) Surgical Technology. The College has withdrawn its request to offer the program leading to the B.S. degree in Business Administration. After approval by the Commission, Virginia College officials expect to choose a location in Florence, renovate the site to their specifications, and implement the programs at the new site. With the approval of CHE, classes will begin at the Florence site in June 2012. The programs will be offered on-ground with the option to take courses through Virginia College Online.

The Committee on Academic Affairs and Licensing considered the item at its December 1, 2011, meeting, tabled the request, and asked that Virginia College provide additional information to support its proposal. The December 1 memorandum from the staff to CAAL is posted on the web site of the Commission at http://www.che.sc.gov/AcademicAffairs/CAA Meeting/CAAMeeting Decoi 2011/3.pdf

Listed below are the Committee's concerns and responses from the institution. Virginia College officials will attend the February 2 meeting to answer any additional questions.

The Committee requested:

- 1. Evidence of the institution's reduced 2009 cohort default rate.
- 2. The most recent enrollment, graduation, and placement statistics for the four sites currently operating in South Carolina.
- 3. Projected enrollment by program for the proposed site in Florence.
- 4. An explanation of the College's not pursuing specialized accreditation for the business program.
- 5. Projected loan debt and income for graduates of the proposed programs. Actual average debt and income would be most helpful.
- 6. Clarification of the transfer policy; which courses or disciplines are not accepted for transfer after five years?
- 7. Confirmation of the average age of students at Virginia College.
- 8. Minimum Accuplacer scores for admission with/without remediation. The pass rate of applicants who take the test. Are students re-tested after remediation?

Responses

1. Evidence of the institution's reduced 2009 cohort default rate.

When the FY 2009 Draft Cohort Default Rates were released in February 2011, Virginia College challenged (under an Incorrect Data Challenge) 495 of the 1041 borrowers listed as defaulted, including 360 loans that the federal government purchased from private lenders in 2009-2010. After purchasing these loans, the federal government did not service them for more than one year, so many of the loans went into default without notice to the student borrower or to the institution. The data managers and the Department of Education agreed that 133 of the 135 "normal" challenges were valid. They did not agree with the 360 loans sold to the federal government that were challenged.

When the official FY 2009 Cohort Default Rates were released in September 2011, the Department only removed 47 of the 133 challenged defaults from the calculation of the default rate. The release of Virginia College's official rate was accompanied by an email (Attachment 1) that stated that some of the data they had agreed to change had not been changed. To get the changes made and the remaining 86 improperly classified borrowers removed from the defaulted borrower pool, the College was required to file an Uncorrected Data Challenge.

Virginia College officials expect to receive an email from the Department after February 20, 2012, stating the true default rate based on the Incorrect Data Challenge and the Uncorrected Data Challenge. That correspondence is expected to reflect 909 defaulted borrowers and a total of 7950 borrowers in the cohort, yielding a correct official 2009 Cohort Default Rate of 11.4%.

Please see Attachment 1 – E-mail from U.S. Department of Education Regarding Challenged Defaults.

2. The most recent enrollment, graduation, and placement statistics for the four sites currently operating in South Carolina.

Site	Enrollment	Date classes began	Graduation	Placement
	(1/17/2012)		Rate	Rate
Greenville	571	October 2008	26.3%	70%
Charleston	458	October 2009	22.8%	56.1%
Columbia	593	April 2010	18.6%	66.7%
Spartanburg	607	January 2011	0	0

Because many of these students have not yet had the full 150% time to complete their programs, institution officials expect graduation rates to increase.

3. Projected enrollment by program for the proposed site in Florence.

The chart below shows projected enrollment for the first year for all programs to be offered at the new site. CHE staff felt it was necessary to include non-degree program enrollment projections as some students may transfer from non-degree programs into programs leading to the A.A.S. degree.

Program	Credential	Projected Enrollment
Administrative Assistant	Certificate	45
Business Administration	AAS	60
Cosmetology	Certificate	75
Criminal Justice	AAS	55
Healthcare Reimbursement	AAS	20
Medical Assistant	Certificate	85
Medical Assistant	AAS	О
Medical Billing & Coding	Certificate	40
Medical Office Administration	AAS	47
Pharmacy Tech	Certificate	30
Surgical Technology	AAS	0
Total Projected Enrollme	457	

4. An explanation of the College's not pursuing specialized accreditation for the business program.

Virginia College has not pursued specialized accreditation for its business program because employers of the College's students have not expected such accreditation when hiring graduates. Three specialized accrediting agencies for business programs are recognized by Council for Higher Education Accreditation (CHEA). The Accreditation Council for Business Schools and Programs (ACBSP) requires regional accreditation. The Association to Advance Collegiate Schools of Business (AACSB) and the International Assembly for Collegiate Business Education (IACBE) accredit only programs that award a bachelor degree or higher. The College has withdrawn its request to offer the program leading to the B.S. degree in Business Administration and will research the requirements for specialized accreditation.

5. Projected loan debt and income for graduates of the proposed programs. Actual average debt and income would be most helpful.

Program	Average loan debt (federal loans)	Average Entry-Level Annual Salary*
Business Administration (AAS)	\$22,593	\$27,219
Criminal Justice (AAS)	\$22,593	\$23,780
Healthcare Reimbursement	\$29,605	\$20,720
(AAS)		
Medical Assistant (AAS)	\$28,674	\$18,948
Medical Office Administration	\$22,593	\$20,113
(AAS)		
Surgical Technology (AAS)	\$22,593	\$28,817

Institution officials performed a student loan debt analysis of students who graduated from Virginia College campuses in South Carolina between June 20, 2010, and July 1, 2011. Because the programs leading to the A.A.S. degree in Business Administration, Criminal Justice, Medical Office Administration, and Surgical Technology did not have three or more cohorts of graduates, program-specific average loan debt could not be calculated. For these programs, the average loan debt for all associate programs is listed.

*Information from SC Works Online Services (www.scworks.org) showing annual wage or salary for the Pee Dee Workforce Investment Act area. Original source is U.S. Department of Labor, Bureau of Labor Statistics.

6. Clarification of the transfer policy - which courses or disciplines are not accepted for transfer after five years?

Courses with a high dependence on technology are generally not accepted for transfer after three years. This would include technology courses in Network Engineering, Administrative Assistant, and other technology-intensive programs because of the rapid changes in these fields. Virginia College prepares students to graduate with current skill sets to increase their potential for productivity early in their employment. Virginia College accepts for transfer credits that have been successfully completed in the same or substantially the same course(s) at other accredited postsecondary institutions. Credit for courses where content remains relatively

constant, e.g., English, accounting, or psychology, is generally granted so long as the credit was earned within the last five years. Virginia College accepts by transfer up to 40 percent of the required credits in a program. Students with transfer credits more than five years old may request consideration by the academic dean.

7. Confirmation of the average age of students at Virginia College.

The average age of all Virginia College students who list South Carolina as their state of residence is 30 years, which is consistent with the average age of all Virginia College on-ground students.

8. Minimum Accuplacer scores for admission with/without remediation. The pass rate of applicants who take the test. Are students re-tested after remediation?

The Accuplacer or the Wonderlic is administered to all applicants at South Carolina Virginia College campuses. The Accuplacer is a computer-adaptive assessment test with no maximum score. The Wonderlic is an aptitude instrument with a maximum score of 50.

The minimum required Accuplacer score for admission to Virginia College programs with the exception of Diagnostic Medical Sonography (DMS), Surgical Technology (ST), Respiratory Care (RC), and Nursing is a combined English (Sentence Skills) and Reading score as follows:

Combined English (Sentence Skills) and Reading Score

87 or below No Entry

88-148 Required Fundamentals class (EDU 0100)

149 and above Clear Entry

The minimum required scores for DMS, ST, and RC will be:

English: 85
Math: 57
Reading: 64
Algebra: 63*

*Note – Respiratory Care where offered

The Wonderlic test is used for Culinary, Cosmetology and Therapeutic Massage. The minimum required scores are:

Cosmetology 14 or above Culinary Arts 16 or above Pastry, Baking 16 or above Therapeutic Massage 16 or above For retesting, the policy states:

- a. Students may retest two additional times for a total of three attempts. The student may not test more than once on a given day.
- b. Any student who previously failed the test three times may have one opportunity to retake and pass the test during a subsequent enrollment period.
 - i. The student will be allowed three additional attempts under the same rules as the original attempt.
 - ii. If the student fails to pass the test by the third test offered during the second enrollment attempt, he/she will not be admitted.

98.81% of South Carolina students who take the Accuplacer test were eligible for entry and 92.47% of students who took the Wonderlic assessment were eligible for entry.

The Fundamentals of Communications (EDU 0100) course is a remedial course designed to address English and reading skills. Students who enroll in the course must receive a passing grade on the first attempt to continue enrollment. Students are not re-tested upon completion of the course. The academic dean may approve a one-time repeat of the course in cases of extenuating circumstances.

Recommendation:

The staff recommends that the Committee on Academic Affairs and Licensing commend favorably to the Commission authorization to the staff to amend the existing license for Virginia College at Birmingham, Alabama, to establish a branch campus in Florence. Existing programs will be offered at Florence leading to the Associate of Applied Science degree in (1) Business Administration, (2) Criminal Justice, (3) Healthcare Reimbursement, (4) Medical Assistant, (5) Medical Office Administration, and (6) Surgical Technology to be implemented in June 2012. The staff recommends that the license be issued with the condition that the institution limit enrollment to correspond with available employment opportunities. The staff further recommends that the Commission authorize the Commission staff to license the site in Florence when the facilities have been developed and inspected by staff.

Attachment 1 - - E-mail from U.S. Department of Education Regarding Challenged Defaults

----Original Message----

From: ecdrappeals@ed.gov [mailto:ecdrappeals@ed.gov]

Sent: Saturday, September 10, 2011 10:02 PM

To: Tom Moore; Woody McDaniel; Woody McDaniel

Subject: eCDRAppeals: Uncorrected Data Adjustment (UDA)

NOTE: URLs in email are usually displayed as clickable links. If you have any questions about whether an e-mail is legitimate, please DO NOT CLICK on any link. As a safe practice, you may copy the URL and paste it in the address bar of your browser and verify that it matches what is displayed in the email.

Virginia College, OPEID: 030106.

Some of the loan records that you alleged were incorrect in the draft Loan Record Detail Report (LRDR), and that the Data Managers have agreed to correct, have not been corrected in the official LRDR. You may submit an Uncorrected Data Adjustment (UDA) for these records. Please refer to the eCDR Appeals UDA User Guide for instructions on how to submit a UDA.

The current cycle is 2009 - Official.

Disclaimer:

Please do not respond to this email. It was sent from an unmonitored account.